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Date: 12/5/05

No. of Pages: 3
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RE:

F. TTO MONITORING REQUIREMENTS

1. General Requirements

The Total Toxic Organics (TTO) limitation is defined as the summation of all quantifiable values that are greater than 0.01 mg/l for the toxic organic compounds listed in Table 2. The sum of all values shall not exceed any TTO limitation(s) in Part I., A..

All toxic organic samples must be collected, preserved and stored in accordance with 40 CFR 136, Appendix A. Samples for volatile organics must be analyzed within 14 days of collection. Samples for semivolatile organics, PCBs and pesticides must be extracted within seven (7) days of collection and analyzed within forty (40) days of extraction.

Toxic organics shall be analyzed using U.S. EPA methods 624 (volatile organics), 625 (semivolatile organics) and 608 (PCBs and pesticides) in 40 CFR 136, or other equivalent methods approved by U.S. EPA. Equivalent methods must be at least as sensitive and specific as methods 624, 625 and 608.

2. Monitoring Alternative for TTO:

In lieu of monitoring for TTO, the permittee may make the following certification as a comment to the periodic reports required by 40 CFR 403.12(e):

"Based on my inquiry of the persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since filing the last Industrial Wastewater Pretreatment Monitoring Report. I further certify that this facility is implementing the solvent management plan submitted to the City."

This statement must be signed by the signatory for the permittee on the Industrial Wastewater Pretreatment Monitoring Report (i.e., IWPMR).

In requesting that no monitoring be required, the permittee shall submit a solvent management plan that specifies to the City's satisfaction the following conditions:

- a. The toxic organic compounds used;
- b. The method of disposal used instead of dumping, such as reclamation, contract hauling, incineration, etc.; and
- c. The procedures for assuring that toxic organics do not routinely spill or leak into the wastewater.

In requesting that no monitoring be required, the permittee shall monitor for all toxic organics listed in Table 2 at least once and submit a copy of the analytical report(s) to the Superintendent. If the permittee can demonstrate compliance with the TTO limit and chooses the certification option in lieu of monitoring, the analytical report(s) shall be submitted for approval within six (6) months from the effective date of this permit.

If the permittee is capable of complying with the above conditions and chooses the certification option in lieu of monitoring, a solvent management plan shall be submitted for approval within six (6) months from the effective date of this permit.

If it is determined that monitoring is necessary to ensure compliance with the TTO limit, the permittee need analyze only for those toxic organics which would reasonably be expected to be present in the discharge.

3. Monitoring Alternative if Toxic Organics are not Used:

In lieu of monitoring for TTO, and at the discretion of the City, the permittee may make the following certification as a comment to the periodic reports required by 40 CFR 403.12(e):

"Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no toxic organics are used at this facility."

This statement must be signed by the signatory on the IWPMR.

In requesting that no monitoring be required, the permittee shall monitor for all toxic organics listed in Table 2 at least once and submit a copy of the analytical report(s) to the Superintendent. If the permittee can demonstrate that toxic organics are not used in the manufacturing processes and chooses the certification option in lieu of monitoring, the analytical report(s) shall be submitted for approval within six (6) months from the effective date of this permit.

If it is determined that monitoring is necessary to ensure compliance with the TTO limit, the permittee need analyze only for those toxic organics which would reasonably be expected to be present in the discharge.